

February 8, 2021

**VIA ECF**

The Honorable Lorna G. Schofield  
United States District Court for the Southern District of New York  
40 Foley Square  
New York, NY 10007

*Jane Doe, et al. v. Trump Corp., et al.*, 1:18-cv-9936 (LGS)

Dear Judge Schofield:

We write on behalf of the parties in the above-referenced action, pursuant to this Court's October 28, 2020 Order (Doc. No. 293 (the "October 28 Order")), to provide the Court with an update on the status of appellate proceedings before the United States Court of Appeals for the Second Circuit.

The Second Circuit took the case under submission on December 1, 2020, following oral argument before Judges Sack, Chin, and Lohier. (2d Cir. Doc. No. 227.) At the close of argument, the panel ordered that "the stay will remain in place until we vacate it." (Hrg. Audio at 37:40 to 37:50, available at <https://www.ca2.uscourts.gov/decisions> (Chin, J., presiding).) The Second Circuit has not taken further action since that time.

The parties will continue to file joint letters updating the Court on the status of appellate proceedings at least every 60 days until the Second Circuit issues a decision on the merits of the consolidated appeals.

Respectfully submitted,

/s/ Roberta A. Kaplan

Roberta A. Kaplan  
John C. Quinn  
Alexander J. Rodney

KAPLAN HECKER & FINK LLP  
350 Fifth Avenue, Suite 7110  
New York, New York 10118  
Telephone: (212) 763-0883  
Facsimile: (212) 564-0883  
[rkaplan@kaplanhecker.com](mailto:rkaplan@kaplanhecker.com)  
[jquinn@kaplanhecker.com](mailto:jquinn@kaplanhecker.com)  
[arodney@kaplanhecker.com](mailto:arodney@kaplanhecker.com)

Andrew G. Celli, Jr.  
Matthew D. Brinckerhoff  
O. Andrew F. Wilson  
David Berman  
Nick Bourland

EMERY CELLI BRINCKERHOFF ABADY  
WARD & MAAZEL LLP  
600 Fifth Avenue at Rockefeller Center  
New York, NY 10020  
Telephone: (212) 763-5000  
[acelli@ecbawm.com](mailto:acelli@ecbawm.com)  
[mbrinckerhoff@ecbawm.com](mailto:mbrinckerhoff@ecbawm.com)  
[awilson@ecbawm.com](mailto:awilson@ecbawm.com)  
[dberman@ecbawm.com](mailto:dberman@ecbawm.com)  
[nbourland@ecbawm.com](mailto:nbourland@ecbawm.com)

*Attorneys for Plaintiffs*

/s/ Joanna C. Hendon

Joanna C. Hendon

ALSTON & BIRD  
90 Park Avenue  
New York, New York 10016  
Telephone: (212) 210-1244  
Facsimile: (212) 210-9444  
[joanna.hendon@alston.com](mailto:joanna.hendon@alston.com)

*Attorneys for Defendants*